

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the matter of	)	
	)	
AMENDEMENT OF PART 97 OF THE	)	
COMMISSION'S RULES GOVERNING	)	RM-10867
THE AMATEUR RADIO SERVICE	)	
	)	
PETITION FOR RULE MAKING BY	)	
THE ARRL	)	

April 19, 2004

To: The Chief, Wireless Telecommunications Bureau

**MY COMMENTS ON THE PETITION FOR RULE MAKING, RM10867**

I. Introduction

I have been a licensed operator since 1972. I have an Amateur Extra class license (W8EH), having passed it back when the commission was still administering the exams. I am also a volunteer examiner for the ARRL-VEC. I participate as an instructor in the Dial Radio Club license preparation classes.

II. Support of the ARRL petition

First, let me say that I fully support the ARRL petition for rule making. Out of all the petitions that have been filed with the commission, the ARRL petition makes the most sense for the advancement of the Amateur Radio Service. They solicited comments from the membership, and individual division directors listened to members in their respective divisions. What they propose is a 'middle of the road' solution to the diverse opinions out there.

It is significant to note that the ARRL board of directors' vote on this petition was unanimous. That fact alone demonstrates the support this petition has.

III. Morse Telegraphy Requirements

The ARRL petition has a solution for the code/no-code debate that has been going on for years.

Eliminating the code requirement for all licenses except Amateur Extra is the way we should go. This will allow all amateurs access to the world wide HF bands. Retaining the morse code requirement for the Extra class will help maintain that telegraphy skill in the amateur service.

There is a push to eliminate morse code telegraphy examinations completely because of the revision of Article 25 at WARC 2003. I don't think eliminating the requirement altogether is the way we should go. While telegraphy has been eliminated from most other services, it is still a traditional part of the amateur radio service. Morse operation will continue without testing, but we need to keep the minimal 5 words per

minute testing for the Extra class license. This will ensure it's continued usage and importance in the amateur radio service.

#### IV. License Restructuring

I feel that the ARRL has hit upon the perfect solution for the license structure to strengthen the Amateur Radio Service. The commission, in its attempt to reduce the number of license classes to 3 in docket 98-143, failed. We still have 6 license classes, although licenses are now issued for just three classes. It can be a confusing mess at times, when we volunteer examiners are conducting test sessions, just to figure out who has what credit. There is also no way to track which Technician licenses have passed the 5 word per minute code test to gain HF band access.

The Advanced and Novice class licenses have been orphans since the action the commission took to 'simplify' the licenses previously. The commission missed the opportunity to upgrade or merge these licenses to Extra and Technician, respectively.

Being involved as an instructor, I can say that the question pools for General and Technician are very similar. Some comments say that there is a big difference, this isn't the case. Having taught courses for both class licenses, I can say with confidence that the Technician licensees should already know what is necessary for operating on the 'worldwide' HF bands.

Most Technicians already have the 'plus' privileges from passing the 5 word per minute morse code test and already have limited HF access. A good portion of those became Technicians back when the written test was the same for both Technician and General (before March 1987). And most Technicians (pre 2000) were tested on some material applicable to HF band operations. Upgrading them to General class will be a good move. This will get down to the true 3 license classes the commission wanted in the last major license revamping.

Upgrading the Advanced class licensees to Extra will be another 'easy' move. The difference between the two classes is small. Before the Advanced license was discontinued, it was a very difficult test. It was very close to what the Extra exam is today. By eliminating the Advanced class, the commission will be able to remove the special rules where Advanced class is mentioned and will be able to eliminate the special HF band voice frequencies for Advanced class.

The new 'revamped' Novice class license will be the needed shot in the arm for the amateur radio service. The material covered by the present Technician license can be very difficult for young people and those with limited experience. The vocabulary and some of the technical material in the exam is way beyond most junior high and high school students. The Technician license has not been a true entry level license because the test material is very broad and covers topics that most new licenses never get involved with. I know this is true, I've taught it in class. We need the new 'Novice' class to have a true limited beginner license.

The new beginners (Novice) need a good taste of world wide HF band operating, more than they can get now. On HF, they are limited to voice on one band (10 meters) and CW only on 4 bands. They need access to voice on the 75 meter and 80 meter bands, were they can keep their interest up. They also need access to digital modes on the HF bands. Small limited band segments on several bands will give them that taste, keep their interest, and give them the incentive to upgrade.

This restructuring of license classes will also provide a larger pool of operators who have access to the world wide HF bands at a time when they may be needed. With the present world situation with terrorism and possibility of terrorist activities, these additional operators with 'HF band' privileges can be used for state wide and regional emergency net activities.

The ARRL has proven in their petition, the need for this change in license structure. This structure will provide an easy way for beginners to get into the amateur service and then an incentive to upgrade to a higher class license.

#### V. Conclusion

I reiterate that I fully support the ARRL proposal for the restructuring of the amateur radio service licenses.

The commission needs to fully address the license structure and morse code requirements in one proceeding.

I hope that the commission gives more weight to the ARRL petition than to the other restructuring petitions that have been put forth. The ARRL petition is representative of a larger number of amateur operators than any other petition. In my opinion it represents the middle ground of all the petitions that have been presented to the commission on this subject.

The ARRL petition should provide the commission with an excellent outline to issue a notice of proposed rule making for license restructuring.

Respectfully submitted,

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